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Work Plan for Technical Assistance Sauget Area 1 and 2 Sites Sauget, Illinois

ARCS Contract No. 68-W8-0086
Work Assignment No. 47-5N60

August 1997

Prepared for:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 5
Office of Superfund
77 West Jackson Boulevard
Chicago, Illinois 60604

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List of Acronyms

ARCS	Alternative Remedial Contracting Strategy
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CBI	Confidential Business Information
Cerro	Cerro Copper Products, Inc.
CO	Contracting Officer
E & E	Ecology and Environment, Inc.
EPA	United States Environmental Protection Agency
IEPA	Illinois Environmental Protection Agency
LOE	Level of Effort
MSL	mean sea level
NPL	National Priorities List
PM	Project Manager
PRP	Potentially Responsible Party
SOW	Statement of Work
TA	Technical Assistance
WACN	Work Assignment Closeout Notification
WACR	Work Assignment Closeout Report
WAF	Work Assignment Form
WAM	Work Assignment Manager
WP	Work Plan

1 Introduction

Ecology and Environment, Inc. (E & E), was assigned by the United States Environmental Protection Agency (EPA) to provide Technical Assistance (TA) related to the Sauget Area 1 and 2 sites located in the villages of Sauget and Cahokia, St. Clair County, Illinois. E & E will provide technical assistance by compiling technical and Potentially Responsible Party (PRP) data relating to the Sauget sites. All work will be conducted under Work Assignment Number 47-5N60, issued under the EPA Region 5 Alternative Remedial Contracting Strategy (ARCS) Contract Number 68-W8-0086.

The objective of E & E's technical assistance is to provide information to EPA for enforcement, cleanup oversight, and cost recovery efforts. Specifically, this work will involve compiling and summarizing existing technical and PRP data for each subunit within the sites. Consistent with the work assignment Statement of Work (SOW), E & E's TA activities will include the following tasks:

- Task 1: Project Planning and Support;
- Task 2: Acquisition of Existing Information;
- Task 3: Property Ownership Tables and Maps;
- Task 4: Technical Data Summary Tables and Maps;
- Task 5: Data Gaps Memoranda; and
- Task 6: PRP Records Compilation.

E & E will furnish all necessary and appropriate personnel, materials, and services needed for, or incidental to, performing and completing the work assignment. In addition, E & E will adhere to all procedures established for Confidential Business Information (CBI) by both the ARCS contract and EPA Region 5.

2 Project Background

This section describes the site location and briefly summarizes the site history and its current status. The information in this section was obtained from the initial SOW submitted to E & E, and from information contained in the Expanded Site Investigation Report prepared by E & E for the Illinois Environmental Protection Agency (IEPA) in May 1988 (E & E 1988).

2.1 Site Description

The Sauget Area 1 and 2 sites are located in and around the villages of Sauget (formerly Monsanto) and Cahokia in west-central St. Clair County, Illinois. The project area consists of 16 sites, comprising six segments of Dead Creek and 10 uncontrolled hazardous waste sites including municipal and industrial waste landfills; surface impoundments or lagoons; surface disposal areas; and past excavations thought to be filled with unknown types of industrial wastes. The disposal sites cover more than 200 acres (see Figure 2-1 for locations of the sites).

The Sauget sites lie within the floodplain, or valley bottom, of the Mississippi River in an area known as the American Bottoms. Surface elevations in the site area range from 400 feet above mean sea level (MSL) to approximately 425 feet above MSL. The primary land use in the vicinity of the sites is industrial, although residential, commercial, and agricultural parcels are dispersed throughout the area.

2.2 Site History

Sauget Area 1 is composed of segments A through F of Dead Creek, and adjacent sites G, H, I, L, and M. Dead Creek is an intermittent creek, sometimes impounded, which was formerly used for waste disposal. The creek segments included in the site extend over a length of 3.5 miles. The creek runs south and southwest through Sauget and Cahokia to an

outlet in the old Prairie DuPont Creek floodway, located south of Cahokia. Sites G, H, and I are inactive landfills or former subsurface/surface disposal areas adjacent to Dead Creek. Site L is the location of a former surface impoundment used by a hazardous and special waste hauler to dispose of wash water from truck cleaning operations. Site M is a former sand pit immediately adjacent to Dead Creek. The Sauget Area 1 site has been extensively investigated by IEPA, its contractors, and by private parties. EPA, IEPA, and private parties have undertaken protective actions such as fencing of the most highly contaminated portions of the site. In 1990 Dead Creek segment A was remediated by Cerro Copper Products, Inc. (Cerro). Cerro removed over 22,000 cubic yards of contaminated creek sediment. In 1995 EPA conducted an extensive investigation of the Site G landfill after an underground fire. After the investigation, EPA consolidated contaminated wastes on site and placed a soil cover on the landfill. The Sauget Area 1 site contains high levels of chlorobenzenes, chlorophenols, chloroanilines, nitroanilines, and PCBs. EPA proposed the Sauget Area 1 site for the National Priorities List (NPL) in June 1996.

The Sauget Area 2 site is composed of sites O, P, Q, R, and S. Site O contains four inactive sludge dewatering lagoons of the old Sauget Wastewater Treatment Plant. Sites P, Q, and R are inactive landfills. Site S is a disposal area for still bottom sludges and chlorinated solvents located near site O. In 1995, EPA removed 13 drums and 279 tons of PCB-contaminated soil from Site Q. Site R was capped by the Monsanto Corporation in 1979. Based on visual observations, Sites Q and R have a long history of leachate flow into the Mississippi River. In addition to the same contaminants found in the Sauget Area 1 site, some parts of Area 2 contain high levels of chlorinated solvents. The Sauget Area 2 sites also have been investigated by IEPA and by consultants for Monsanto and the Village of Sauget. IEPA and EPA anticipate that the Sauget Area 2 site will be proposed to the NPL early in 1998.

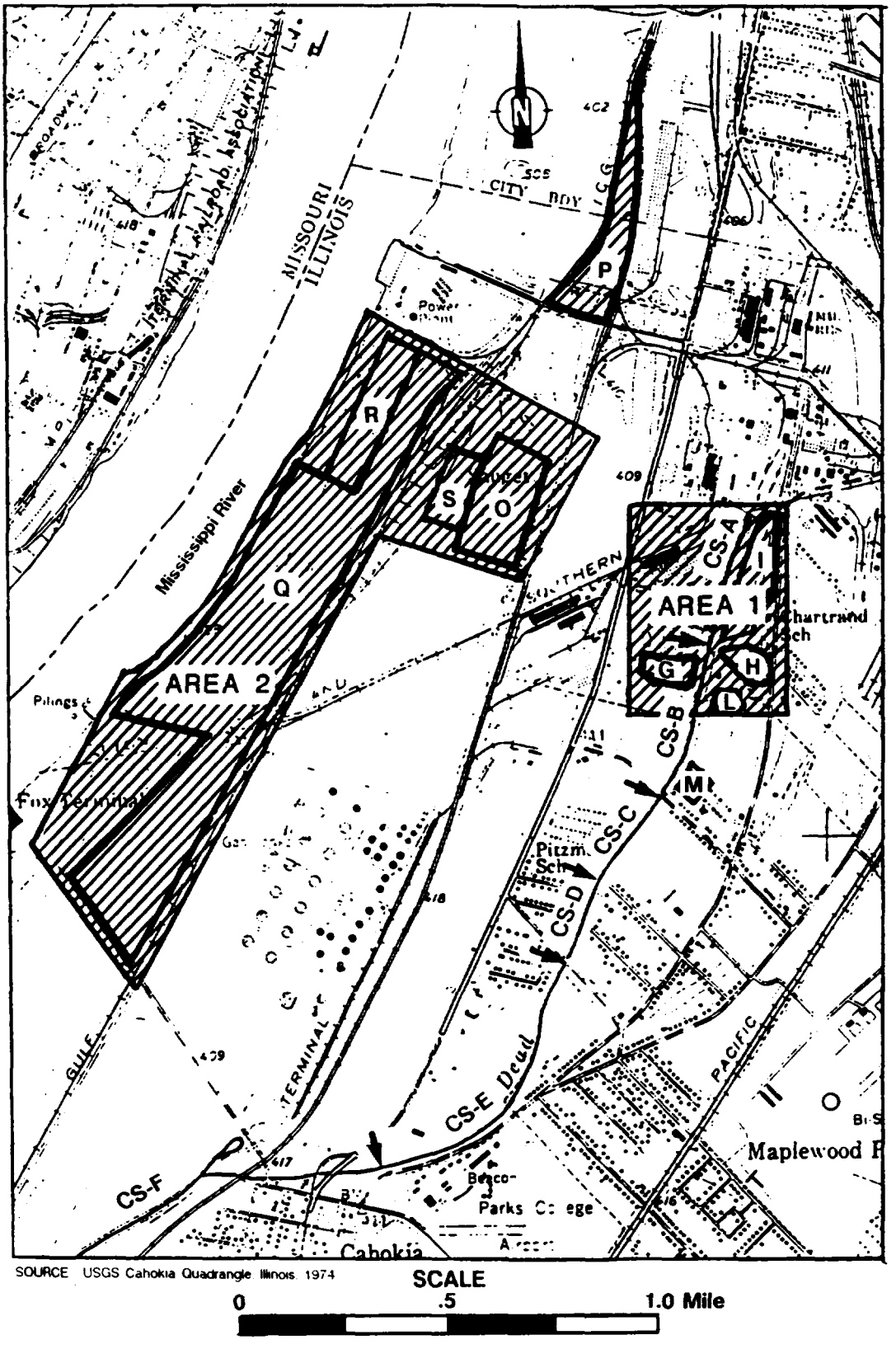


FIGURE 2-1 SAUGET AREA 1 and 2 SITE LOCATIONS

3 Description of Work

The tasks that will be conducted to accomplish the SOW objectives for the Sauget Area 1 and 2 sites are presented in this section. The following tasks will be conducted for the project:

- Task 1.0: Project Planning and Support;
- Subtask 1.1: Project Planning;
- Subtask 1.2: Project Management;
- Task 2.0: Acquisition of Existing Information;
- Task 3.0: Property Ownership Tables and Maps;
- Task 4.0: Technical Data Summary Tables and Maps;
- Task 5.0: Data Gaps Memoranda; and
- Task 6.0: PRP Records Compilation.

As specified by the SOW and in discussions with EPA, the work breakdown structure for each of these primary tasks includes subtasks for financial tracking and management purposes. The activities to be conducted by E & E for each of the above tasks and their associated subtasks are described below.

3.1 Task 1.0: Project Planning and Support

3.1.1 Subtask 1.1: Project Planning

E & E prepared this Work Plan (WP) to include a detailed description of the tasks to be conducted under this work assignment. E & E attended a kick-off meeting for the project on July 23, 1997. A revised SOW was issued in Work Assignment Form (WAF) Revision 1

based upon discussions between E & E and EPA at the meeting. This WP includes a detailed description of the approach for the technical and PRP data compilation activities in accordance with SOW Revision 1. Specifically, the items included in this WP include:

- E & E's technical approach for each task to be performed, including a detailed description of each task; the assumptions concerning the technical effort required for the task; the information needed for each task; any information to be produced during and at the conclusion of each task; and a description of the work products that will be submitted to EPA (see the project schedule in Section 4);

- A schedule showing the dates for completion of each task and subtask and submission of each deliverable required by the EPA SOW. The schedule includes information about timing, initiation, and completion of all critical path milestones for each activity and deliverable, and the expected review time for EPA (Section 4);

- A cost estimate to complete the work assignment is attached to the transmittal letter for this Work Plan. The cost estimate includes a breakdown of the cost and Level of Effort (LOE) by labor category for each subtask of the work assignment. The primary assumptions used in developing the cost estimate are also detailed in the attachment.

After submittal of the WP, E & E will attend a fact finding/negotiation meeting with EPA, if needed. At this meeting, EPA and E & E will agree upon a final technical approach and associated costs required to accomplish the project objectives. If requested by EPA, E & E will prepare a revised Work Plan after the fact finding/negotiation meeting. This final Work Plan will be submitted to EPA within 15 days after the meeting.

In addition to preparation and submittal of the project WP, the E & E project manager will conduct a one-day site visit with the EPA Work Assignment Manager (WAM) and the IEPA Project Manager (PM) during the project planning phase in order to familiarize himself with the project and develop a conceptual understanding of the site, as directed in the SOW.

3.1.2 Subtask 1.2: Project Management

E & E will perform general work assignment project management including: weekly communication of project progress and status with the WAM; management, file maintenance, forecasting, and tracking of costs; preparation of Monthly Progress Reports; attendance at project meetings; and final project closeout. It is anticipated that the period of performance

for this project will be from July 1997 through February 1998. The primary project management activities are further described below.

Prepare Monthly Status Reports

E & E will prepare Monthly Progress Reports. These reports will document the technical progress and status of each task and subtask for the reporting period in accordance with contract requirements. E & E will report costs and LOE by P-level for the reporting period, as well as cumulative amounts expended to date. Monthly invoices will be prepared and submitted in accordance with the level of detail specified in the ARCS contract.
In addition to the monthly cost reporting, E & E will notify the Project Officer, Contracting Officer (CO), and WAM in writing when the 75% and 95% levels of the approved work assignment budget have been expended.

Participate in Meetings and Routine Communications

E & E will attend project meetings, document meeting results, and contact the WAM by telephone, as required, to report project status. A total of two meetings attended by two E & E personnel will be assumed for this project after submittal of the final WP, as specified in the SOW. These two meetings are progress update meetings to be conducted as the project progresses from the point of the work plan approval. In accordance with the SOW, E & E will communicate (either face-to-face or by telephone) with the WAM on a weekly basis, at a minimum, to report project status.

Close Out Work Assignment

E & E will perform the necessary activities to close out the Work Assignment in accordance with ARCS contract requirements. Closeout activities include:

- **Return Documents to EPA.** E & E will complete any document control activities, will box up all draft and final versions of all deliverables and raw data, and send them to the EPA Region 5 Superfund Records Center, or as directed in the Work Assignment Closeout Notification (WACN); and

- **Prepare Work Assignment Closeout Report (WACR).** E & E will prepare and submit a WACR as directed in the WACN.

3.2 Task 2.0: Acquisition of Existing Information

Under this task, E & E will locate all existing technical and PRP information concerning the Sauget Area 1 and 2 Sites held by, but not limited to, the agencies and municipalities listed below:

- U.S. EPA Region 5 Offices in Chicago:
  - Superfund Division
  - Waste, Toxics, and Pesticides Division
  - Water Division

- IEPA Offices (Springfield and Collinsville):
  - Superfund Program
  - RCRA Program
  - Water Programs

- Miscellaneous Federal Agencies:
  - U.S. Fish and Wildlife Service
  - U.S. Food and Drug Administration
  - U.S. Department of Agriculture
  - U.S. Army Corps of Engineers

- Miscellaneous State and Local Agencies:
  - Illinois Department of Public Health
  - Illinois Department of Transportation
  - St. Clair County
  - Village of Sauget and Fire Department
  - Village of Cahokia and Fire Department
  - East Side Health Department

E & E will contact the sources listed above, by telephone, to inquire about file materials, if any, that may be pertinent. File searches will be scheduled and conducted based on the results of these inquiries. E & E assumes, at a minimum, that one week will be required to review IEPA files in Springfield and one week will be required to review files from sources in the site area.

Other sources of information may be investigated in addition to those listed above. At each location listed above, and any others investigated, E & E shall develop a log of all sources of information present at each location. While conducting the file searches through the aforementioned locations, E & E will copy all file information relating to the following:

- Current property ownership information;

- Analytical data for any Area 1 or 2 site;

- Waste generator or disposal information;
- PRP information or liability; and
- Any other information E & E deems useful for completion of the work assignment.

E & E will contact the WAM frequently during the file searches in order to decide what files to copy for the work assignment. The information obtained by list or copied for transport back to E & E's Chicago office will be incorporated in one or more databases of information for the project. The list of information to be compiled for each source location is discussed in further detail under Task 4. Each piece of file information copied for the master site file will be indexed using a Bates stamp, indexed accordingly, and referenced in any site deliverables based upon the Bates stamp number.

3.3 Task 3.0: Property Ownership Tables and Maps

Under this task, the information obtained during file the searches of the various agencies regarding current property ownership for the Area 1 and 2 Sites will be compiled and summarized. Current property ownership will be determined by conducting a deed search at the St. Clair County Tax Assessor's Office in Belleville, Illinois, and information regarding ownership will be supplied for each subunit (e.g., Site G, Site H) of each of the Area 1 and 2 Sites. In addition, names and addresses of contiguous property owners will also be compiled for this task. All property owner information will be supplied in a table showing names and addresses, with a map keyed to the property owner table. Copies of all property legal descriptions will be obtained during the deed search and will be provided along with the appropriate property tables and maps. Separate tables and maps will be produced for the Sauget Area 1 and Sauget Area 2. An example of a proposed property ownership table is presented as Table 3-1. The property owner tables and maps completed under this task will be submitted to EPA within 60 calendar days after the work plan approval date.

3.4 Task 4.0: Technical Data Summary Tables and Maps

This task will be used to compile and summarize all technical data for each subunit of the sites and for groundwater at each site. The information obtained will be compiled directly into summary tables for each subunit or into a database for each site area. The volume and types of data obtained will determine which format will be used. If a database format is

chosen to compile the data, E & E will use information extracted from this database to create data summary tables, and data will also be presented on the maps developed for the Sauget Area 1 and Sauget Area 2 sites.

Information Database

E & E may compile a technical information database incorporating all information collected during performance of the tasks in this work assignment. If a database format is chosen for this task, E & E intends to use ACCESS database software to enter the project information. The ACCESS database can the be manipulated to produce the required project tables using a variety of sorting factors.

Data Summary Tables

E & E will organize the technical data into separate summary tables for the Sauget Area 1 and Area 2 sites. These summary tables will be further organized by individual sites (e.g., Site R) within each Sauget Area. In addition, technical data will be organized to evaluate evidence of groundwater contamination at each site. The data summary tables, organized by site within each Sauget site area (1 and 2), will be accompanied by a narrative description of the data. The narrative shall, at a minimum, include the sources of data used to compile the summary tables, a description of the nature and extent of contamination (including known contaminant sources, distribution, and trends), and the containment and its integrity, if known. An example of the proposed data summary table format is presented in Figure 3-1.

Three copies of the draft technical data tables will be submitted to EPA within 90 days after approval of the work plan (assuming ready availability of file information from the sources listed). Based on E & E's familiarity with the project area and past experience, a large volume of data regarding the site areas is anticipated. E & E and the WAM have agreed to assume that the summary tables could consist of approximately 2,500 discrete samples for data entry purposes. Technical submittal milestones may need to be altered based upon availability and quantities of data encountered during the file searches. After receipt of EPA comments on the draft technical summary tables, E & E will incorporate the appropriate changes based upon the comments and submit three final copies of the technical data summary tables within 30 days after receipt of EPA comments on the draft.

Maps

E & E will develop site maps for Sauget Area 1 and Sauget Area 2. The Area 1 and Area 2 maps will include the location of all subunits, sample locations, selected contaminants, and contaminant levels. The selected contaminants to be presented on the area maps will be determined in discussions with the WAM after E & E has had the opportunity to examine the existing analytical data and the types and diversity of contaminants evident in the file information. The maps may be produced by subunit rather than area, depending upon the scale and numbers of samples and data that need to be presented. An example of a possible format for the site maps and data has been presented to and discussed with the WAM.

Three copies of the draft maps will be submitted to EPA within 90 days after approval of the work plan. Again, as indicated above, technical submittal milestones may need to be altered based upon availability and quantities of data encountered during the file searches. After receipt of EPA comments on the draft maps, E & E will incorporate the appropriate changes based upon the comments and submit three final copies of the maps within 30 days after receipt of EPA comments on the draft.

3.5 Task 5.0: Data Gaps Memoranda

Following the evaluation of the technical data and information summarized under Task 4.0, E & E will assess the contaminant distribution and trends, and identify any data gaps that appear to exist within a given area or subunit. E & E will develop and deliver a memorandum for each of the two site areas, which will discuss the data gaps identified from the existing technical information. The memoranda will briefly discuss the history of the site areas and subunit(s), the samples collected to date, the nature and extent of contamination, and the apparent data gaps identified through review of this information. These memoranda will be delivered to EPA within 30 days after submittal of the draft technical data tables and maps.

3.6 Task 6.0: PRP Records Compilation

PRP Files Setup

E & E will compile any file records that are relevant to a PRP search, according to Section 3.1.1 of the *Potentially Responsible Party Search Manual* (OSWER Directive 9834.6). Relevant Sauget Area 1 or Area 2 site PRP records will include, but not be limited to, correspondence, hazardous waste manifests, technical data and reports, permits,

complaints, investigations, fire department chemical reports, litigation files, bankruptcy files, responses to Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) 104(e) information requests, and any other relevant records. These records will be copied from the file searches described earlier and organized in specific PRP files. The PRP-specific files will be categorized using either a Bates stamp or other unique numbering system to sequentially number all documents within a file. E & E will also create an index for those items pertaining to either 1) several PRPs, or 2) discussing subjects of a general nature. Material specific to one PRP will be filed with other documents pertaining to that PRP, thereby creating a liability file of evidence for each PRP.

PRP Database

After completion of the file searches and data compilation, E & E will compile a PRP database, using ACCESS database software, that summarizes the existing PRP information and any additional PRP information gathered during the file searches. The PRP database will include, but not be limited to, the information that was presented in Attachment 5 of the initial SOW. An example of the proposed database data entry format and an example of the listing format for the PRP information are presented in Attachment 1. Two copies of the PRP database will be submitted to EPA within 90 days of work plan approval by EPA. After receipt of comments from EPA, a final PRP database will be submitted within 30 days of receipt of agency comments.

PRP Waste Disposal Personnel List

E & E will compile a list of all persons linked to waste disposal for each PRP, using the information obtained from the PRP files. The waste disposal personnel information shall include, but not be limited to, names, addresses, telephone numbers, company position, and involvement with waste disposal. Two copies of the PRP Waste Disposal Personnel List will be submitted to EPA within 90 days of work plan approval by EPA. After receipt of comments from EPA, a final PRP Waste Disposal Personnel List will be submitted within 30 days of receipt of agency comments.

Table 3-1

SAMPLE PROPERTY OWNERSHIP TABLE
SAUGET AREA 1 SITES*

Area Subunit	Reference No.	Tax Parcel No.	Property Owner (Name, Address, Phone)
G	G-1	1-26-401-6	Mr. John Doe 2283 Main Street Anywhere, USA 90995 (333) 333-3333
	G-2		
	G-3		
	G-4		

Note: The sample table has been only partially filled in. The actual table would be completely filled in.

* A separate table will be prepared for the Sauget Area 2 sites.

SAUGET AREA 1 SITES

SOIL SAMPLES - SITE M

Volatile Organic Compounds (UG/KG)

	Sample Number		Q		Q		Q		Q		Q		Q		Q	Maximum
	Sample Depth (ft)		U		U		U		U		U		U		U	Concentration
	Date Collected		A		A		A		A		A		A		A	Detected
VOC			L		L		L		L		L		L		L	
Chloromethane																
Bromomethane																
Vinyl chloride																
Chloroethane																
Methylene chloride																
1,1-Dichloroethene																
1,1-Dichloroethane																
1,2-Dichloroethene (total)																
Chloroform																
1,2-Dichloroethane																
1,1,1-Trichloroethane																
Carbon Tetrachloride																
Bromodichloromethane																
1,2-Dichloropropane																
trans-1,3-dichloropropene																
Trichloroethene																
Dibromochloromethane																
1,1,2-Trichloroethane																
Benzene																
cis-1,3-dichloropropene																
2-Chloroethylvinyl ether																
Bromoform																
Tetrachloroethene																
1,1,2,2-Tetrachloroethane																
Toluene																
Chlorobenzene																
Ethylbenzene																
Acetone																
Carbon disulfide																
2-Butanone																
Vinyl acetate																
2-Hexanone																
Styrene																
Total xylenes																
4-Methyl-2-pentanone																

TABLE 3-1 PROPOSED DATA SUMMARY TABLE FORMAT

4 Project Organization, Schedule, and Cost

4.1 Management, Organization, and Approach

The technical assistance activities to be performed for this work assignment, including technical data and PRP compilation, will be accomplished using the task breakdown provided in Section 3 of this Work Plan. Implementation and management of the tasks outlined in the SOW will include the following key elements:

- Oversight and frequent communication with file reviewers, the WAM, and the EPA PRP Inspector to ensure efficiency of data collection;
- Monthly work progress and expenditures reporting to EPA; and
- Weekly communication with EPA to discuss work progress.

The E & E Site Manager will have primary responsibility for implementing all of the technical assistance activities outlined in the SOW. E & E's project organization for the completion of the Sauget Area 1 and 2 Sites technical assistance tasks is presented on Figure 4-1.

The major responsibilities of key personnel are described below:

- **Program Manager.** Mr. Daniel Sewall is E & E's ARCS 5 Program Manager. In this position, Mr. Sewall coordinates all ARCS 5 activities and assures overall compliance with the ARCS 5 prime contract requirements;
- **Site Manager.** Mr. Craig Carlson, C.P.G., is the Site Manager for the Sauget Area 1 and 2 sites. The Site Manager is responsible for implementing the overall work assignment. The Site Manager's primary function is to ensure that technical, financial, and scheduling objectives are achieved. The Site Manager will report directly to the EPA WAM, and will provide the main point of contact for matters

concerning the project. The Site Manager is also responsible for coordinating the publications, data management, graphics, and technical support activities as required to accomplish this work assignment.

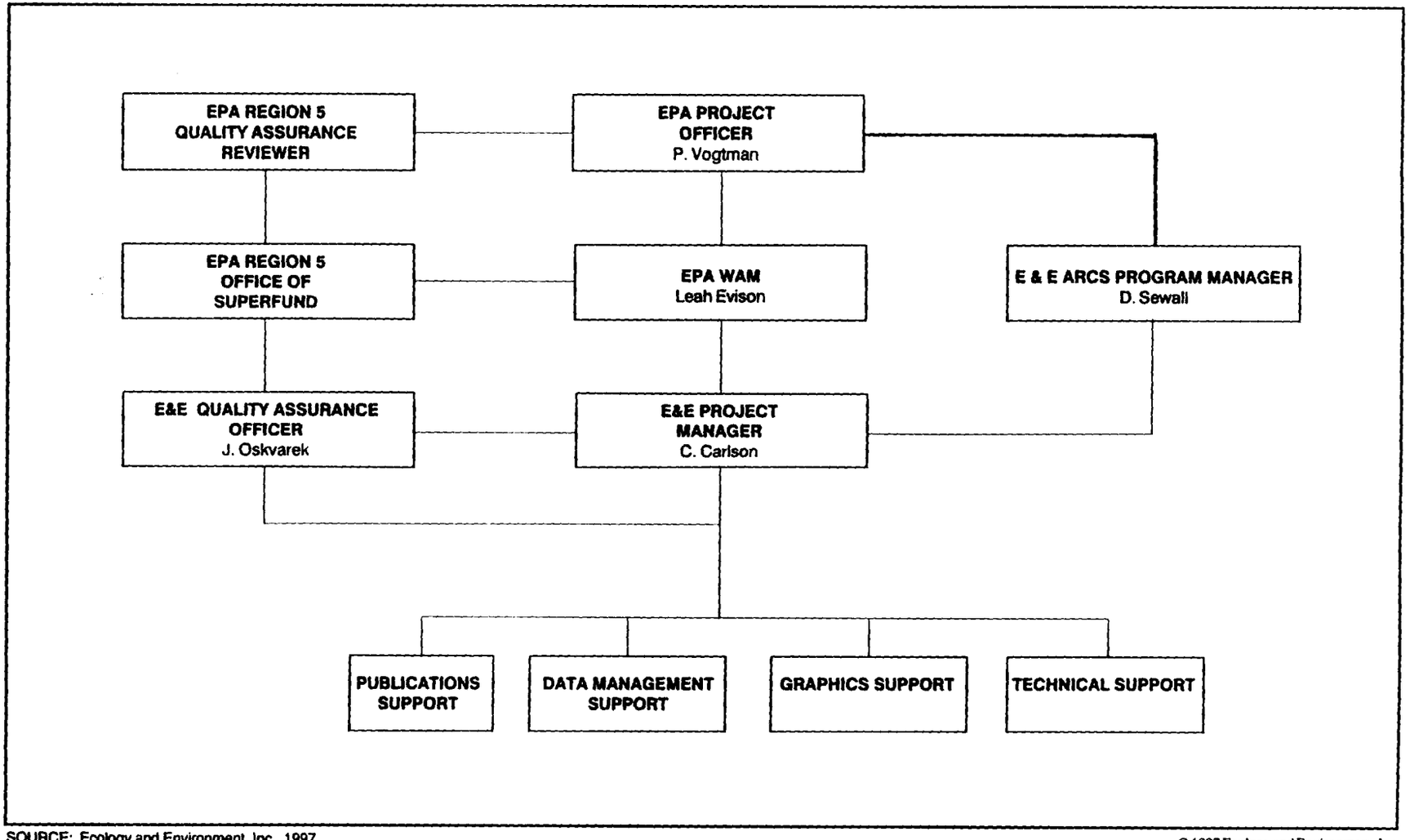
4.2 Project Schedule

E & E's anticipated project schedule for completion of the project tasks and subtasks is presented on Figure 4-2. The schedule assumes that approval of the Work Plan will be granted on September 2, 1997; technical assistance file search activities will begin by September 15, 1997, and be completed by September 26, 1997; and all technical and PRP data should be present in house at E & E by September 29, 1997. A summary of major TA deliverables (milestones) is presented in Figure 4-2. Milestones presented in Figure 4-2 are highly dependent upon the actual date of the work plan approval and budget authorization, and the volume of information and data acquired during the Task 2 file search activities.

4.3 Project Cost

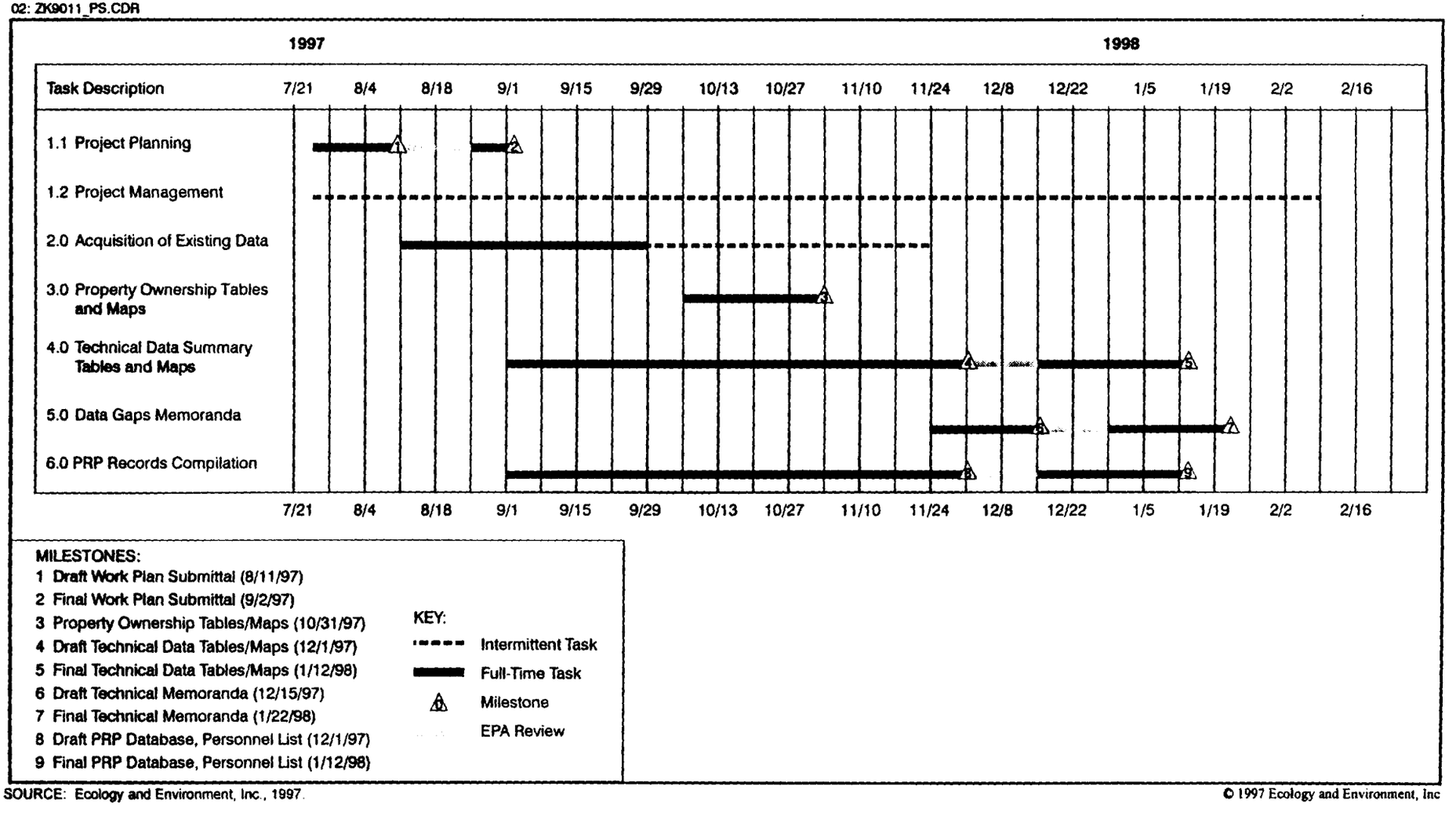
A detailed cost spreadsheet, showing each task and subtask, along with worksheets to develop these costs, is provided as an attachment to this work plan. Also included are the primary assumptions used by E & E in developing the budget estimate for this Work Assignment. Upon receiving verbal approval of the budget estimate, E & E will prepare and submit Optional Form 60 and Standard Form 1411 to the EPA CO.

02: ZK9011_O.P65



SOURCE: Ecology and Environment, Inc., 1997

Figure 4-1 PROJECT ORGANIZATION CHART, SAUGET AREA 1 AND 2 SITES TECHNICAL ASSISTANCE



SOURCE: Ecology and Environment, Inc., 1997.

Figure 4-2 PROJECT SCHEDULE, SAUGET 1 AND 2 SITES TECHNICAL ASSISTANCE

5 References

Ecology and Environment, Inc. (E & E), May 1988, *Expanded Site Investigation, Dead Creek Project Sites, Cahokia/Sauget, Illinois,* prepared for the Illinois Environmental Protection Agency.

United States Environmental Protection Agency (EPA), July 1997, *Work Assignment Form-Revision No. 01 with Statement of Work Revision No. 01,* for Work Assignment 47-5N60, Sauget Area 1 and 2 Sites, dated July 23, 1997.

_____, May 1987, *Potentially Responsible Party Search Manual—Final Report,* prepared by Planning Research Corporation, (OSWER Directive 9834.6).

1 Sample Data Entry and Listing Formats

PRP Information Database — EXIT

Data Entry Form — Enter PRP information below. Use the number next to the data category to see explanation of the information required for that category.

1.	**PRP:**	Big Time Polluter Company
2.	**Corporate Address:**	111 West Jackson Blvd. Chicago, IL 60604
3.	**Facility Address:**	77 West Jackson Blvd. Chicago, IL 60604
4.	**Site:**	Sauget Waste Treatment & Disposal Company
5.	**Type of PRP**	Owner/Operator

For Owner Operators...

5a.	Time Period:	June 1983 to July 1990
5b.	Did disposal of hazardous substances occur during the time or ownership/operation? Check box if yes.	☒
5c.	Type of activity:	Hazardous Waste Disposal

For Generators...

5d.	Type of facility:	
5e.	Major Products:	
5f.	Substances Disposed of at the site:	
5g.	Haz Substances Disposed of at the site:	
5h.	Hazardous Substances produced or stored (including volumes):	
5i.	Time Period of Disposal:	

For Transporters...

5j.	Nature of substances and volumes:	
5k.	Linking Evidence to Generators:	
5l.	Did the transporter select the site for disposal or treatment?	

6.	**Actions Taken:**	A cleanup was conducted on 7/23/94. See attached report prepared by BBL
7.	**Financial Viability:**	Site owner declared banckruptcy on 7/11/89.
8.	**Secondary Viability:**	None
9.	**Evidence Assessment:**	Definite Linking Evidence

(EXAMPLE OF DATA ENTRY FORMAT)

SAUGET SITES PRP INFORMATION

08-Aug-97

A GENERAL INFORMATION

1. **PRP:** Bill's Hazardous Waste Transport
2. **Corporate Address:** 2132 Harm's Way Road, Cleveland Ohio
3. **Facility Address:** 150 W. Dirty Road, Sauget, IL
4. **PRP Type:** Transporter
5. **Site:** Dirty Road Waste Site

B. OWNER/OPERATOR INFORMATION

1. Time Period: N/A
2. Did Disposal of Hazardous substances occur?: No
3. Type of activity: N/A

C. GENERATOR INFORMATION

1. Type of facility: N/A
2. Major Products: N/A
3. Substances disposed of at the site: N/A
4. Hazardous substances disposed of at the site: N/A
5. Hazardous aubstances produced or stored: N/A
6. Time Period of Disposal: N/A

D. TRANSPORTER INFORMATION

1. Nature of substances and volumes: Transported F032 wastes for Big Dirty Company. Approximately 25,000 gallons total.
2. Linking evidence to generators: Waste Manifests
3. Did the transporter select the site for disposal or treatment?: Disposal

Continued on next page

(EXAMPLE OF PRP DATA PRINTOUT)

Sauget Sites PRP Listing

08-Aug-97

Owner/Operators

PRP	Corporate/Facility Address	Site	Evidence Assessment
Big Time Polluter Company	111 West Jackson Blvd. Chicago, IL 60604/77 West Jackson Blvd. Chicago, IL 60604	Sauget Waste Treatment & Disposal Company	Definite Linking Evidence

Transporters

PRP	Corporate/Facility Address	Site	Evidence Assessment
Bill's Hazardous Waste Transport	2132 Harm's Way Road, Cleveland Ohio/150 W. Dirty Road, Sauget, IL	Dirty Road Waste Site	Probable Linking Evidence

(EXAMPLE OF PRP DATA PRINTOUT - SORTED BY PRP TYPE)